

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

THERESA M. OWENS,

Plaintiff,

v.

ELI LILLY AND COMPANY,

Defendant.

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Civil Action No.: 1:04-cv-11562-JLT
Next Event: Status Conference on
March 7, 2006 at 10:00 a.m.

**CONSENT MOTION TO EXTEND TIME TO FILE PLAINTIFF'S OPPOSITION TO
DEFENDANT ELI LILLY AND COMPANY'S MOTION FOR SUMMARY JUDGMENT
AND TO CONTINUE STATUS CONFERENCE**

COMES NOW the Plaintiff, by and through counsel, with the consent of Defendant Eli Lilly and Company ("Lilly"), and moves the Court to extend the time in which Plaintiff shall file her Opposition to Defendant's Motion for Summary Judgment until April 17, 2006 and to continue the Status Conference currently set for March 7, 2006, and as grounds therefore states:

1. Defendant filed its Motion for Summary Judgment on February 2, 2006, and Plaintiff's Opposition to same would be due on February 16, 2006.

2. Defendant's Motion involves complex issues regarding Statute of Limitations, and requires a more extensive review and preparation in order for the Plaintiff to properly respond.

3. A Status Conference is scheduled in this matter for March 7, 2006. The parties would request, in order to conserve judicial resources and time, that the Status Conference be continued to a date consistent with the Court's calendar after May 5, 2006, in order that Defendant's Motion may be fully briefed prior to the Conference.

4. Counsel for Defendant Lilly has consented to the granting of this Motion.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order extending the time in which Plaintiff shall file her Opposition to Defendant's Motion for Summary Judgment to April 17, 2006, and to continue the Status Conference set for March 7, 2006 to a date consistent with the Court's calendar after May 5, 2006.

Respectfully submitted,

TODD & WELD LLP

/s/ Erica Tennyson

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LOCAL RULE 7.1(a)(2) CERTIFICATION

I have been informed that consent to the foregoing Motion to Extend Time to File Plaintiff's Opposition to Defendant Eli Lilly and Company's Motion for Summary Judgment and to Continue Status Conference was granted by counsel for Defendant Lilly on February 2, 2006.

/s/ Erica Tennyson

Erica Tennyson, BBO#660707